

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

SHAQUILLE DUKES; CREDALE MILES;)
and MARQWANDRICK MORRISON;)
 Plaintiffs,)
 vs.)
FREEPORT HEALTH NETWORK)
MEMORIAL HOSPITAL, a Not-for-profit)
Corporation; RYAN GODSIL, individually)
And as an agent of FREEPORT HEALTH)
NETWORK MEMORIAL HOSPITAL;)
THE CITY OF FREEPORT,)
a Municipal Corporation; SERGEANT)
JEFF ZALAZNIK, individually and as an)
OFFICER DAN MOORE, individually and as)
an agent of the CITY OF FREEPORT;)
OFFICER JUSTIN HOLDEN, individually)
and as an agent of the CITY OF FREEPORT;)
 Defendants.)

Court No.: 3:19-cv-50189
Judge: Hon. John Z. Lee
Magistrate: Hon. Lisa A. Jensen

JOINT STATUS REPORT

1. Discovery:

A. Briefly describe the status of discovery: **The parties have completed substantial written discovery, including Rule 26 initial disclosures, issuance of subpoenas and issuance of and answers to written discovery. The parties have completed depositions for the three plaintiffs and have completed the depositions of all defendants with the exception of Officer Holden. The parties have also completed depositions of nine fact witnesses under the control of the defendants. The parties are currently setting dates for the remaining Defendant and other involved individuals in person and over Zoom in January, February and March 2021. Per this Court's last order, fact discovery closes on April 1, 2021.**

2. Motions:

A. Briefly describe any pending motions, as well as any motions a party anticipates filing in the next 45 days. **On December 28, 2020, Plaintiff filed an unopposed motion to extend all deadlines by four months.**

3. Status of Settlement Discussions:

A. Describe the status of any settlement discussions and whether the parties request a settlement conference. **Plaintiff issued a demand to all Defendants**

and has not received a counteroffer at this time. The parties will consider requesting a settlement conference at a later date.

4. Other Issues:

- A. Briefly describe any other issues that require Court action and request any agreed action that the Court can take without a hearing. **None.**
- B. Indicate whether the parties believe a telephonic hearing with the Court is necessary and time sensitive, and, if so, identify the issue(s) that warrant discussion. **The Court scheduled a telephonic status hearing with Magistrate Jensen on January 11, 2021 at 9:15 a.m.**

Dated: January 4, 2021

Respectfully Submitted,

ROMANUCCI & BLANDIN, LLC

/s/ Ian Fallon

Antonio M. Romanucci
Bhavani Raveendran
Ian Fallon
ROMANUCCI & BLANDIN, LLC
321 N. Clark Street, Suite 900
Chicago, Illinois 60654
Tel: (312) 458-1000
Fax: (312) 458-1004
aromanucci@rblaw.net
braveendran@rblaw.net
ifallon@rblaw.net

Ben Crump
Ben Crump Law
368 W Huron Street, Suite 100
Chicago IL 60654
Phone: 800-859-9999
Fax: 800-770-3444
bencrump@bencrump.com

Attorneys for Plaintiffs

/s/ Michael F. Iasparro

Michael F. Iasparro
Hinshaw & Culbertson LLP
100 Park Avenue P.O. Box 1389 Rockford,
IL 61105-1389
Telephone: 815-490-4900
Facsimile: 815-490-4901
miasparro@hinshawlaw.com

Attorney for Defendants FHN and Godisil

/s/ Eric A. Krumdick

Eric A. Krumdick (Atty #6190791)
Maisel & Associates
161 N. Clark Street, Suite 800
Chicago, IL 60601
(D) 312.458.6534
Email for Service:
RPMLaw1@travelers.com
General Email: ekrumdic@travelers.com

*Attorney for City of Freeport, Officers
Zalaznik, Holden and Moore*